

ID: CCA-120514-14

UILC: 6662.00-00

Number: **201504012**

Release Date: 1/23/2015

From: [REDACTED]

Sent: Monday, December 05, 2014 14:04

To:

Cc:

Bcc:

Subject: Re: 6662(h)(1) penalty question

[REDACTED]

Where the value of the property the taxpayers overvalued was not claimed on a return, neither the substantial valuation misstatement penalty nor the gross valuation misstatement penalty may be applied to the underpayment resulting from the disallowed interest expense deductions, pursuant to §6662(e)(1).

Please let me know if we can be of any further assistance.

Best,

[REDACTED]